

Commissioner for Patents
App. No. 09/660,026
Nov. 22, 2004
Page 7 of 8

REMARKS

This Second Supplemental Amendment is submitted to address the Examiner's facsimile transmission, on Nov. 15, of the following reference: S. Devadas, A. Ghosh, K. Keutzer, "An Observability-Based Code Coverage Metric for Functional Simulation," 1996 IEEE/ACM International Conference on Computer-Aided Design, pp418-425 (hereinafter, "the Devadas reference"). During a subsequent telephonic discussion with Examiner Day, on Nov. 15, the Examiner indicated his opinion that claim 1 was anticipated by the Devadas reference, but that claim 4 is allowable. Applicants greatly appreciate the Examiner's willingness to allow the applicants to address the Devadas reference with the present Second Supplemental Amendment.

1. Claim Rejections

Applicants have amended claims 1, 20 and 21 to provide greater clarity on how the history of a target tag value differs from a tag of the Devadas reference.

An overview of the meaning and structure of tags, as presented in the Devadas reference, can be found in the first three paragraphs of Section III. A. ("Tags") on page 420. The tags of the Devadas reference represent the "possibility of an error." A positive and negative tag is introduced on every assignment statement. Subsequent to a tag's introduction, both its positive and negative components can be propagated, just the positive component can be propagated or just the negative component can be propagated. Thus, a tag, in accordance with the Devadas reference, can assume one of three states (if neither the positive nor negative component is propagated, the "tag" ceases to exist).

Propagation of a tag from one assignment statement to another, in the Devadas reference, is accomplished by application of the "tag calculus" (see Section III. F., page 422) to the assignment statement's inputs.

Claim 1 is distinguished from the Devadas reference in at least the following ways.

First, claim 1 is directed to "identifying a subset of the input signals having an observably controllable effect." No such identification of a subset is done in the Devadas reference since the Devadas reference is based upon the possibility of errors being propagated in accordance with an error model.

Second, claim 1 is directed to determining "a history comprised of a tag value of each input signal that is a member of the subset." In the Devadas reference, there is no way a tag can have a history that is comprised of a tag value of each input signal since the tag determined is composed of one of three possible states.

Commissioner for Patents
App. No. 09/660,026
Nov. 22, 2004
Page 8 of 8

2. Summary

As applicants have now addressed the Devadas reference, applicants respectfully request a Notice of Allowance.

The U.S. Patent and Trademark Office is hereby authorized to charge any fee deficiency, or credit any overpayment, to our Deposit Account No. 502584 referencing docket number 06816.0172.

Respectfully submitted,



Jonathan T. Kaplan
Registration No. 38,935

Date: Nov. 22, 2004

**JONATHAN T. KAPLAN
ATTORNEY AT LAW
140 NASSAU STREET
NEW YORK, NY 10038-1501
TEL. 917-674-5017**